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USDOC FOR 532/OEA/LHINES/DFARROW
USDOC FOR 3132 FOR FCS/OIO REGIONAL DIRECTOR WILLIAM
ZARIT
BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS

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E.O. 12958: N/A
TAGS: [BMGT](#) [BEXP](#) [HK](#) [ETRD](#) [ETTC](#)
SUBJECT: EXTRANCHECK: PRE-LICENSE CHECK: Brink's Hong
Kong Limited

REF: A) USDOC 04706 B) EXP.LIC. D362247

¶1. Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

¶2. As per reftel A request and at the direction of the Office of Enforcement Analysis (OEA) of the USDOC Bureau of Industry and Security (BIS), Export Control Officer Philip Ankel (ECO), conducted a pre-license check at Brink's Hong Kong Limited, 1022W First Floor, Kwai Chung Container Terminal 3, New Territories, Hong Kong (Brink's Hong Kong). The purpose of the visit was to determine the suitability of Brink's Hong Kong to be the recipient of 28 tactical police riot helmets and 100 harnesses/chin straps that are the subject of export license application D362247. The items (ECCN 0A979) are valued at USD \$11,220 and are controlled for crime control (CC) reasons. The license applicant is Galls Incorporated, 1340 Russell Cave Rd., Lexington, KY 40505 (Galls).

¶3. Brinks Hong Kong is the wholly owned subsidiary of Brink's, Incorporated in the United States and Brink's Hong Kong has been in operation in Hong Kong since 1979 (www.brinks.com.hk).

¶4. On August 29, 2006, the ECO visited Brink's Hong Kong at the address above and met with Joseph Chu, Assistant Human Resources and Administration Manager. Mr. Chu stated that guard employees are issued helmets for use in performing their duties. Employees typically keep the helmets in their employee lockers when they are not using them but Mr. Chu stated that there is no specific requirement that employees keep the helmets at the Brink's facility after hours.

¶5. Mr. Chu stated that the work of Brink's Hong Kong security crews sometimes takes them into mainland China and that the helmets go with those crews. Additionally, Mr. Chu volunteered that this latest order replaces some prior helmets also ordered from Galls in October 2004 (Galls is the primary supplier of this type of equipment to Brink's Hong Kong). Mr. Chu further stated that old helmets are destroyed when they are no longer useable since they include the Brink's logo and Brink's is keen to avoid such helmets falling into the wrong hands.

¶6. This ECO recommends BIS ascertain whether the 2004 shipment of helmets required a license and, if so,

whether such license was obtained. Note: Reftel A states that Brink's Hong Kong does not have a licensing history with BIS.

17. Brink's Hong Kong was very forthcoming during the PLC visit. Mr. Chu provided information on the intended use of the items and on past shipments of the same (or similar) items. Additionally, the items are appropriate for the intended end-user and stated end-use. However, the ECO discovered additional facts during the course of the PLC visit that should be addressed, as appropriate, during the licensing process. In particular, as noted above, Brink's Hong Kong expects that its employees will be taking the helmets into China from time to time as their duties take them there. Additionally, it appears Brink's Hong Kong received a shipment of comparable helmets in October 2004 for which a license may have been required but not obtained by Galls. As a result, the ECO recommends that this PLC be considered to be Limited. Cunningham